

**UNITED STATES DISTRICT COURT**  
for the  
Eastern District of Michigan

United States of America  
v.

Alexander FAIR

Case No. 24-30406

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 12, 2024 and August 6, 2024 in the county of Wayne and elsewhere in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. 2251(a) & (e)	Sexual exploitation of a minor and attempt
18 U.S.C. 2252A(a)(2)	Distribution/receipt of child pornography and attempt
18 U.S.C. 2422	Coercion and enticement o a minor and attempt
18 U.S.C. 1470	Transfer of obscene material to a minor

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: September 20, 2024

City and state: Detroit, Michigan

  
Complainant's signature

Special Agent Michael Hendricks, - HSI  
Printed name and title



Judge's signature

Honorable Kimberly G. Altman, U.S. Magistrate Judge  
Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR  
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Michael Hendricks, being first duly sworn, state as follows:

1. I am a Special Agent with Homeland Security Investigations (HSI), of the United States Department of Homeland Security (DHS). I have been employed as a Special Agent for HSI since January 2020. I successfully completed the Criminal Investigator Training Program (CITP) (2015) and the HSI Special Agent Training (HSISAT) (2021) at the Federal Law Enforcement Training Center (FLETC) in Glynco, GA. Prior to joining HSI, I completed the U.S. Secret Service Special Agent Training (SABT) in Beltsville, MD (2015). I also completed the Health and Human Services Office of Inspector General (HHS-OIG) Special Agent Basic Training Program (SABT) in Largo, MD (2016). I received a bachelor's degree in Public Safety Studies from Sienna Heights University and a master's degree in Public Administration from the University of Michigan. Additionally, I am a Computer Forensic Agent (CFA). I have successfully completed the Basic Computer Evidence Recovery Training (BCERT) and Basic Mobile Device Forensics Training (BMDF) at the IRS-CI Digital Forensics Lab in Woodbridge, VA. While employed at HSI, I have investigated Federal criminal violations related to cybercrime, child exploitation, and child pornography. I have received training on child pornography and child exploitation and have had the opportunity

to observe and review numerous examples of child pornography (as defined in U.S.C. 18 § 2256) in all forms of media.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for Alexander FAIR for violations of 18 U.S.C. § 2251(a) & (e) (sexual exploitation of a minor and attempt), 18 U.S.C. § 2252A(a)(2) & (b)(1) (distribution/receipt of child pornography and attempt), 18 U.S.C. § 2422(b) (coercion and enticement of a minor and attempt), and 18 U.S.C. § 1470 (transfer of obscene material to a minor).

3. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information made available to me by other law enforcement professionals. These facts are provided for the sole purpose of establishing probable cause for the issuance of a criminal complaint and arrest warrant; therefore, this affidavit does not necessarily contain all information uncovered during this investigation. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause for an arrest warrant for Alexander FAIR.

4. Pursuant to the provisions of Title 18, United States Code, section 2256, “child pornography,” as used in this affidavit, includes any visual depiction,

including any photograph, film, video, picture, or computer generated image or picture of sexually explicit conduct where the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct or is a visual depiction of a minor engaging in sexually explicit conduct.

5. In August 2024, HSI SA Michael Hendricks was advised of a police investigation relating to an identified minor victim (MV-1), who is 15 years old and resides in Wayne County, Michigan, and Snapchat communications. Snapchat is a social media application that allows individuals to send communications to each other over the internet.

6. On August 7, 2024, police officers met with MV-1. MV-1 advised that MV-1 had sent nude images of himself/herself on Snapchat, and there was likely child exploitation material of himself/herself on his/her cell phone and Snapchat account. Police officers obtained MV-1's cell phone and consent to search that phone. I conducted a forensic extraction of MV-1's cell phone.

7. While reviewing the Snapchat conversations on MV-1's phone, I observed a conversation with a Snapchat user with username alenxadr.80305 and display name Alex FAIR (the Subject Account).

8. The conversation between the Subject Account and MV-1 was initiated on approximately June 12, 2024. There were almost 2200 communications in the conversation. On approximately June 20, 2024, during a

conversation about meeting for sex, MV-1 sent the Subject Account a message stating "... I ain't 16 yet." The Subject Account responded, "Damn / That's ok / I like it that your young." The Subject Account also continued the sexual conversation, stating, "I'm gonna fuck yoy in the ass to ;)," and "Do you know any girls younger that might want to do a threesome."

9. Below is a sample of further messages that Snapchat user Alex FAIR sent to MV-1 using the Subject Account:

- a. FAIR: Know any girls like a year or two younger?  
Fri Jun 21 03:10:27 UTC 2024
- b. FAIR: The younger the better  
Fri Jun 21 03:10:57 UTC 2024
- c. FAIR: Get me a young girl we can rape  
Fri Jun 21 03:12:17 UTC 2024
- d. FAIR: I wanna see your pussy  
Fri Jun 21 03:20:06 UTC 2024
- e. FAIR: You sure you okay with me wanting to rape younger girls  
Fri Jun 21 15:42:00 UTC 2024
- f. FAIR: I think the youngest id going to would is like 10  
Fri Jun 21 15:46:18 UTC 2024
- g. FAIR: Can I see your pussy  
Fri Jun 21 15:51:05 UTC 2024
- h. FAIR: Can I see your asshole  
Fri Jun 21 5:57:35 UTC 2024

- i. FAIR: I wanna see your pussy again 😊  
Mon Jun 24 22:50:10 UTC 2024m.
- j. FAIR: I want you to have sex with an animal  
Sun Jun 30 11:01:22 UTC 2024
- k. FAIR: What if I rape a little kid  
Wed Jul 03 15:10:10 UTC 2024  
  
FAIR: Like 8  
Wed Jul 03 15:12:25 UTC 2024  
  
FAIR: I'd prefer them to be like 10  
Wed Jul 03 15:14:48 UTC 2024
- l. FAIR: I can't wait to rape you  
Thu Jul 04 16:32:11 UTC 2024  
  
FAIR: I'm gonna use every hole  
Thu Jul 04 16:32:40 UTC 2024
- m. FAIR: Video if you piss or shit  
Tue Jul 09 00:21:00 UTC 2024
- n. FAIR: How old is your brother  
Thu Jul 11 22:38:31 UTC 2024  
  
MV-1: [Age under 18 years old]  
Thu Jul 11 22:38:55 UTC 2024  
  
FAIR: Should ask to fuck  
Thu Jul 11 22:39:04 UTC 2024  
  
FAIR: Or see if he would suck your toes  
Thu Jul 11 22:39:18 UTC 2024

10. I also observed multiple photographs and videos that were sent between Subject Account and MV-1. This is a sample of what I observed:

a. Fri Jun 21 15:51:05 UTC 2024

FAIR sends MV-1 the following message: “Can I see your pussy”

MV-1 replies with a photo of a female, nude from the waist down. Her face and shirt are not visible, her vagina is in the center of the photograph.

b. Thu Jun 27 01:53:02 UTC 2024

MV-1 sends FAIR a photograph of MV-1 sitting with a dog.

FAIR replies: “Let them lick your pussy” and “Show me videos”

MV-1 sends FAIR a video of a dog licking a vagina.

c. Thu Jul 04 18:39:17 UTC 2024

FAIR sends MV-1 three photographs of an erect penis.

d. The aforementioned images and video were labeled ‘Silent Snap’ in the results provided by Snapchat. This indicates that the images and video were taken within the Snapchat application by the user, rather than uploaded into Snapchat from a different location.

11. I also observed about a dozen photographs sent by the Subject Account showing a male wearing a United States Marine uniform, as well as numerous additional photographs of the same individual, including selfie-style photographs. I compared these photographs to a military identification photograph for Alexander FAIR, and these appear to show the same individual.

12. On August 26, 2024, I obtained a federal search warrant in the Eastern District of Michigan for the Subject Account. On September 9, 2024, I downloaded

the results of the search warrant provided by Snapchat. The communications received from Snapchat for the Subject Account contained many of the same messages and media exchanged with MV-1, as described above. In addition, I observed other chats from the Subject Account in which the user of the Subject Account provided his phone number. This phone number was the same as FAIR's phone number in his military records.

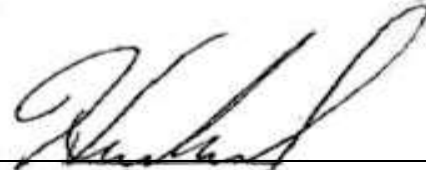
13. Based on the information above, there is probable cause to believe that Alexander FAIR violated 18 U.S.C. § 2251(a) & (e) (sexual exploitation of a minor and attempt), 18 U.S.C. § 2252A(a)(2) & (b)(1) (distribution/receipt of child pornography and attempt), 18 U.S.C. § 2422(b) (coercion and enticement of a minor and attempt), and 18 U.S.C. § 1470 (transfer of obscene material to a minor).

14. Wherefore by this affidavit and application, Affiant requests that the Court authorize the issuance of a criminal complaint and arrest warrant for Alexander FAIR.

*[This area left intentionally blank]*



Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael Hendricks", written over a horizontal line.

Michael Hendricks, Special Agent  
Department of Homeland Security  
Homeland Security Investigations

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

A handwritten signature in black ink, appearing to read "Kim G Altman", written over a horizontal line.

Hon. Kimberly G. Altman  
United States Magistrate Judge

Date: September 20, 2024